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March 22, 2006

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Standardization Section  
Fresh Products Branch  
Fruit & Vegetable Programs  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Room 1661 South Building, Stop 0240  
Washington, D.C. 20250-0240

To Whom It May Concern:

**Re: United States Standards for Grades of Table Grapes  
(European or Vinifera Type)  
Docket #FV-06-304**

Established in 1926, Western Growers is an agricultural trade association whose nearly 3,000 members grow, pack and ship 90% of the fresh vegetables and nearly 70% of the fresh fruits and nuts grown in Arizona and California. This accounts for more than one half of the nation's fresh produce production.

It is on behalf of those members that are growers and shippers of fresh table grapes that I am submitting comments in support of the proposal in the Federal Register published January 24, 2006 on pages 3818- 3819. To establish a support position, Western Growers has participated in a collaborative and transparent process in multiple meetings coordinated with the California Grape & Tree Fruit League, which included industry stakeholders and USDA Fresh Products Branch to thoroughly discuss and prioritize areas of recommended changes to the current U.S. Table Grape Standard.

The consensus of the grape industry was to recommend that the current U.S. Grade Standard be amended to more equitably score at destination the defect of shatter. Specifically, with the advent of new and improved methods of packaging grapes in consumer units such as in clamshells and or zip locked bags, the method of calculating shatter as a defect needs reconsideration. As all consumer packaged grapes are now marketable, regardless of shatter, a tolerance needs to be established for inspections at destination markets. This allowance would adapt the USDA standards to the evolved industry practices. Also consistent with consumer research, the establishment of a negligible tolerance would be consistent with the needs and expectations of the ultimate consumer.

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This narrowly focused request would allow the USDA standards to adjust to industry marketing practices which reflect that a vast majority of grapes are shipped and sold in consumer units. As such, the table grape industry requests that the current standards be modified by providing a 10% allowance enroute or destination for shattered berries in consumer containers. The standards currently provide a 12% total tolerance for bunches and berries failing to meet the requirements of grade for enroute or at destination. By revising the standards to include a separate 10% allowance would mean that shattered berries would not be scored as a defect against the 12% total tolerance until the amount of shattered berries first exceed 10%. This change to the U.S. Grade Standard is being requested for inspections taken at destination only. Shipping point standards and inspection protocols would remain the same at origin. In addition, this requirement is limited to grapes packed in consumer packages only and would not affect plain packed grapes in a master shipper container.

Therefore, at this time, it is on behalf of Western Growers that I respectfully submit these comments supporting the petition amending the U.S. Grade Standard for Table Grapes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas R. Oliveri', followed by a large, stylized circular flourish.

THOMAS R. OLIVERI  
Director, Trade Practices & Commodity Services

C: Cheri Emery – Cheri.Emery@usda.gov